

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

True the Vote, Jane Coln, Brandie Correro, §  
Chad Higdon, Jennifer Higdon, Gene §  
Hopkins, Frederick Lee Jenkins, Mary §  
Jenkins, Tavish Kelly, Donna Knezevich, §  
Joseph Knezevich, Doris Lee, Lauren Lynch, §  
Norma Mackey, Roy Nicholson, Mark §  
Patrick, Julie Patrick, Paul Patrick, David §  
Phillee, Grant Sowell, Sybil Tribble, Laura §  
VanOverschelde, and Elaine Vechorik §

Plaintiffs, §

v. §

Cause No. 3:14-cv-00532-HTW-LRA

The Honorable Delbert Hosemann, in his §  
official capacity as Secretary of State for the §  
State of Mississippi, The Republican Party of §  
Mississippi, Copiah County, Mississippi §  
Election Commission, Hinds County, §  
Mississippi Election Commission, Jefferson §  
Davis County, Mississippi Election §  
Commission, Lauderdale County, Mississippi §  
Election Commission, Leake County, §  
Mississippi Election Commission, Madison §  
County, Mississippi Election Commission, §  
Rankin County, Mississippi Election §  
Commission, Simpson County, Mississippi §  
Election Commission, and Yazoo County, §  
Mississippi Election Commission §

Defendants. §

**DECLARATION**

By: Catherine Engelbrecht

EXHIBIT 2

1. I, Catherine Engelbrecht, verify under penalty of perjury under the laws of the United States of America that the following is true and correct. *See* 28 U.S.C. § 1746.
2. I am the founder and President of True the Vote. True the Vote is a non-profit organization that monitors elections for compliance with state and federal law and identifies instances of voting irregularities, including the failure of election officials to verify the identity of voters and the failure of election officials to disqualify ineligible voters from voting in both Republican and Democratic primaries. It trains volunteers to conduct these activities.
3. As part of its mission to protect electoral integrity, True the Vote examines official lists of eligible voters and other voter registration data to verify their accuracy and currency. Its purpose in undertaking these efforts is to protect the integrity of the electoral process and to ensure that accurate and current voter rolls are maintained by each state.
4. In the days immediately preceding the June 24 Republican Primary Run-Off Election, I requested access to voting records from Hinds and Rankin County on behalf of True the Vote. The purpose of my request was to protect the integrity of the electoral process by investigating claims of potential irregularities in the lead-up to the Primary Run-Off Election.
5. I made a request at the Hinds County circuit clerk's office on June 23, 2014 for absentee ballot applications and envelopes.
6. I made an oral request to inspect absentee ballot applications and envelopes in the Hinds County Circuit Clerk office. I was unable to inspect and copy the records I requested.
7. I made a request at the Rankin County circuit clerk's office on June 23, 2014 for absentee ballot applications and envelopes.
8. I made an oral request to inspect absentee ballot applications and envelopes from Becky Boyd, the Rankin County Circuit Clerk. I was unable to inspect and copy the records I requested.
9. I am a custodian of certain records of True the Vote in my role as President. Offered in connection with this Declaration are business records from True the Vote relating to its efforts requesting records from various Mississippi Counties regarding the 2014 Republican Primary Run-Off Election. These Records are kept by True the Vote in the regular course of business, and it was the regular course of business of True the Vote for an employee, volunteer or representative of it with

knowledge of the act, event, condition, opinion, or diagnosis recorded to make each Record or to transmit the information to be included in each such Record, and each Record was made at or near the time or reasonably soon thereafter. The Records are the original or exact duplicates of the originals.

10. Further, declarant sayeth not.

Signed on this the 5th day of August, 2014.

A handwritten signature in black ink, appearing to read 'C. Engelbrecht', written over a horizontal line.

Catherine Engelbrecht